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VIA ELECTRONIC FILING

September 14, 2023

The Honorable Brett H. Ludwig
United States Courthouse
517 East Wisconsin Avenue
Milwaukee, WI 53202

Re: ***Estate of Laliah Swayzer, et al. v. Witkowiak, et al.***
Eastern District of Wisconsin Case No. 16-CV-1703

Dear Judge Ludwig:

I request a brief telephone conference with the Court today or tomorrow to protect the emotional well-being of Nurse Mai Bruno. Ms. Bruno is a former Armor employee who responded to the emergency in Swayzer's cell. She was deposed in the matter and reports she has experienced severe emotional distress related to the incident and her deposition.

Ms. Bruno received a subpoena from Attorney Gende on Wednesday. Ms. Bruno is not among the seventeen (17) witnesses disclosed pursuant to Rule 26(a)(3) on plaintiffs' Pretrial Witness list. (ECF 663 at 4). She telephoned my office to report that she is experiencing severe emotional distress and that she is seeking psychiatric attention. I passed this information to Mr. Gende with the hope he would dismiss her from the subpoena as a matter of common decency and because she is not a properly disclosed witness. He refused. Ms. Bruno has also spoken to him directly and was apparently told she is being called because she lied in her deposition and the Marshals would come to get her.

Ms. Bruno should not have been subpoenaed by plaintiffs. The continued threat of arrest is potentially damaging her. We request the Court address the issue so that she is not required to

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suffer through the weekend. Ms. Bruno is prepared to join a call with the Court if the Court can make time in its schedule.

Thank you.

Very truly yours,

LEIB KNOTT GAYNOR LLC

/s/ Douglas S. Knott

Douglas S. Knott

DSK/csg

cc: All parties of record via ECF notification